

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:)	
David E. Gravlin, Jr.)	CHAPTER 13
Debtor)	CASE NO. 17-41714-CJP
)	

RESPONSE TO SUPPLEMENTAL MOTION TO DISMISS CHAPTER 13

Now comes David Gravlin, Jr. (hereinafter “Debtor”) by and through his attorney, James P. Ehrhard, and responds to the Supplemental Motion to Dismiss Chapter 13 filed by Lora A. Fickett, as follows:

The Debtor asserts that he has fulfilled his domestic support obligations to his ex-wife Lora A. Fickett. Ms. Fickett did not number her paragraphs in her motion but for purposes of this response the Debtor will respond to each paragraph as if they were numbered.

1. The Debtor admits that there were three (3) children that were the product of his marriage with Lora A. Fickett.
2. The Debtor states that, in full context, he is fulfilling his requirements under the separation agreement with respect to college expenses.
3. The Debtor states that, in full context, he is fulfilling his requirements under the separation agreement with respect to uninsured medical and dental expenses.
4. The Debtor states that, in full context, he is fulfilling his requirements under the separation agreement with respect to college expenses.
5. The Debtor states that, in full context, he is fulfilling his requirements under the separation agreement with respect to medical and dental expenses.

WHEREFORE, the Debtor respectfully requests that this Honorable Court not dismiss the above-captioned case.

Respectfully submitted,
David E. Gravlin, Jr.
By his attorney,

/s/ James P. Ehrhard
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Dated: June 14, 2019

CERTIFICATE OF SERVICE

I, James P. Ehrhard, on this 14th day of June, 2019 do hereby certify that I served a copy of the *Response to Supplemental Motion to Dismiss Chapter 13* to the parties listed below via first class mail if not noted as having received electronic service:

Richard King, Esq.: VIA ECF

Denise Pappalardo, Esq.: VIA ECF

Wendy Mead, Esq.: VIA ECF

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